

DEBORAH J. BLUM, ESQ.

225 Broadway, Suite 715 • New York, NY 10007

Patrick Fan, MBA *Legal Intern*
Ariella Ruben *Legal Assistant*

T • (646) 535-2586
M • (845) 304-5312
F • (212) 409-8279

July 1st, 2024

Via CM/ECF

The Hon. Judge Nicholas G. Garaufis
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: KEITH ALAN RANIERE v. UNITED STATES OF AMERICA
Case Nos. 1:24-CV-02925 & 1:18-CR-00204
Second Request for Extension of Time to Amend Pro Se Motion to
Vacate Under 28 U.S.C. § 2255

Dear Hon. Judge Garaufis:

My office represents Keith Alan Raniere (hereinafter referred to as “Mr. Raniere”) solely in his 2225 application which is pending before the Court. Your Honor granted my office’s request for a ninety (90) day extension of time to amend the 2255, [1259], to August 5th, 2024.

At this juncture, I am respectfully requesting that the Court grant a final extension of time¹ and allow my office an additional thirty-one (31) days to submit the amended filing on or before September 5th, 2024.

The reason for this request is after my initial request was made on May 6th, 2024, I had a death in the family of a close family member on May 18th. Apart from court appearances which could not be postponed, mainly trial/hearing matters, I took time off from my practice to grieve and process the loss. I recently returned to work full-time and realize that the undertaking of this matter requires additional time for completion.

Lastly, in my limited communication with Mr. Raniere, it has become apparent to me that I will need to set up an in-person legal visit with him to finalize the submission. During the one call that I had with Mr. Raniere, the call kept getting dropped and it is my understanding that this frequently occurs during his legal calls. Additionally, to my

¹ Absent extenuating circumstances.

knowledge, Mr. Raniere has only been permitted four (4) in-person legal visits by USP Tuscon in the past nine (9) months. As a result, an extension of time will enable me to have more effective communication with him.

Thank you very much in advance for this Honorable Court's consideration of this request. I can best be reached on my mobile phone, (845) 304-5312 or through email, deborah@deborahjblum.com.

Very truly yours,

A handwritten signature in black ink that reads "Deborah J. Blum". The signature is written in a cursive, flowing style.

Deborah J. Blum

cc: Via Email and Facsimile
Joseph Reccoppa
Courtroom Deputy to
The Hon. Judge Nicholas G. Garaufis

Via Email
Nicholas J. Moscow, Esq.
Deputy Chief, Criminal Appeals
United States Attorney's Office for The Eastern District of New York